

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

PGI POLYMER, INC.,

Plaintiff,

v.

CHURCH & DWIGHT CO., INC. et al.

Defendants/Counterclaim  
Plaintiffs.

Civil Action No.:  
3:15-CV-0214  
(FDW)(DSC)

**DEFENDANTS' JOINT MOTION TO REDACT AND FILE UNDER SEAL  
PURSUANT TO LcvR 6.1**

COME NOW Defendants BI-LO, LLC, Boscov's Department Store, LLC, Church & Dwight Co., Inc., Delhaize America, LLC, Karmin Group, Karmin Industries, LaMi Products, Inc., Samson Merger Sub, LLC, Southeastern Grocers, LLC, Winn-Dixie Stores, Inc., X-S Merchandise, Inc., by and through their legal counsel, jointly submit this motion to file documents under seal pursuant to LcvR 6.1. Defendants specifically seek to file under seal all documents which contain the following information:

1. Documents and/or information marked as "Confidential" or "Highly-Confidential-Attorneys' Eyes Only" by Plaintiff pursuant to the Stipulated Protective Order. DE 76;
2. Declarations of non-parties regarding their business activities, including their sales figures pertaining to non-woven wipes;
3. Documents and/or information pertaining to the sales numbers of any party.

All of the above-referenced items contain confidential business information, or are documents designated as confidential by parties other than Defendants. The information

designated as confidential by Defendants is proprietary and should not be disclosed on the public record. Such disclosure would provide Defendants' proprietary information directly to Defendants' competitors. To the best of Defendants' knowledge, this information is not publicly available

**WHEREFORE**, Defendants respectfully request that the Court grant Defendants' Motion for Redact and File Under Seal.

This the 2<sup>nd</sup> day of March, 2016

Respectfully submitted,

**COLLEN IP**

/s/ Jeffrey A. Lindenbaum

Jeffrey A. Lindenbaum

*Admitted Pro Hac Vice*

**COLLEN IP**

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*Counsel for Defendants/Counterclaim Plaintiffs*

### **CERTIFICATE OF SERVICE**

I hereby certify that on March 2, 2016, I electronically filed the foregoing “Defendants’ Joint Motion to Redact and File Under Seal Pursuant to LCvR 6.1” with the Clerk of Court using the CM/ECF system. Service of the same on Plaintiff will be accomplished through the Notice of Electronic Filing, in accordance with LCvR 5.3.

/s/ Matthew J. Ladenheim

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